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PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

IN RE	§	
	§	
AUTO INC.	§	
	§	Case no. 17-50969-11
	§	
	§	
	§	CHAPTER 11
DEBTOR	§	

MOTION TO SELL PROPERTY OF THE ESTATE

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS.  
IF NO TIMELY RESPONSE IS FILED WITHIN 21 DAYS FROM THE DATE OF SERVICE THE RELIEF REQUESTED MAY BE GRANTED WITHOUT A HEARING BEING HELD.**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Auto, Inc., (“Debtor”), Debtor in the above styled and numbered cause and files this its Motion to Sell Property of the Estate (“Motion”) and would respectfully show unto the Court as follows:

1. This Court has jurisdiction over this proceeding and the parties and property affected hereby pursuant to 28 U.S.C. §§1334 and 157. Consideration of the Motion

constitutes a core proceeding as defined in 28 U.S.C. §157(b)(2)(A), (K), (M) and (O).

2. The Debtor commenced this proceeding on April 27, 2017 by filing a voluntary petitions under Chapter 11 of the United States Bankruptcy Code. Since the filing of the petition, the Debtors have remained in possession of their assets and continued in operation of their businesses as debtors-in-possession pursuant to 11 U.S.C. §§1107 and 1108.
- 3 The Debtor is in the automobile towing business in Colorado and Texas.
4. In this capacity the Debtor has amassed a number of trucks. As a result in a downturn of Debtor business, the Debtor no longer needs all of the trucks in its possession.
5. The Debtor seeks to sell the property located a Exhibit "A".
6. IT is the Debtor's intend to sell these trucks over time to obtain a best possible price for this equipment. The Debtor proposes to be allowed to sell the trucks over time so long was the trucks are sold for at least 75% of the Debtor's current value for each truck.
7. There are no liens against the trucks.
8. The Debtor would request that court authorize the Debtor to sell the trucks set forth on Exhibit A free and clear of all liens claims and encumbrances and allow the liens against the trucks to attach to the proceeds of the sale.
9. Debtors would request that the Court allow the Debtors to sell the trucks free and clear of all liens claims and encumbrances and that the net sales proceeds be placed into the Debtor in Possession account with all liens attaching to the proceeds and not

to be distributed without further order of this Court.

WHEREFORE, PREMISES CONSIDERED, the Debtor would request this matter be set down for an Hearing and that upon hearing, this Court enter and Order authorizing the Debtors' Sale of the trucks as set forth herein, and for such other and further relief as the Debtor may show itself justly entitled.

Respectfully submitted,

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By:       /s/ Eric Liepins        
Eric A. Liepins, SBN 12338110  
PROPOSED ATTORNEY FOR DEBTOR

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion was sent to all creditors of the estate via mail on this the 31st day of May, 2017.

      /s/ Eric Liepins        
Eric A. Liepins

Unit #	Year	Make	Model	Fuel Type	VIN#	License Plate #	State	Exp Date	Loan/Lease Co.	Loan/Lease #	Date	Truck Value
SAN405	2007	STERLING	360	DIESEL	JLSBBG1S57K012681	T7682H	TX	3/1/2016	PURCHASED	NONE	NONE	\$ 25,000.00
PUE303	2007	STERLING	FLATBED	UNLEADED	JLSBBG1S87K012710	278EQN	CO	8/1/2017	PURCHASED	NONE	NONE	\$ 25,000.00
COS205	2005	ISUZU	FLATBED	DIESEL	JALC4B16357005903	277EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 30,000.00
COS206	2007	STERLING	FLATBED	DIESEL	JLSBBG1S97K012702	650QJP	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 25,000.00
COS208	2005	ISUZU	FLATBED	DIESEL	JALC4B16257005911	275EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 23,000.00
COS209	2007	MITSUBISHI	4WD	DIESEL	JL6BEC1547K008281	281EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 25,000.00
COS210	2006	MITSUBISHI	FLATBED	DIESEL	JL6BBG1S36K003927	282EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 23,000.00
COS211	2007	MITSUBISHI	4 X 4	DIESEL	JL6BEE1S17K003731	283EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 30,000.00
COS212	2007	STERLING	FLATBED	DIESEL	JLSBBG1S67K012687	284EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 25,000.00
COS213	2007	STERLING	FLATBED	DIESEL	JLSBBG1S57K012695	363EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 25,000.00
COS214	2005	ISUZU	FLATBED	DIESEL	JALC4B16757011381	276EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 20,000.00
COS216	2006	MITSUBISHI	FLATBED	DIESEL	JL6BBG1S46K003922	365EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 25,000.00
COS202	2007	STERLING	FLATBED	DIESEL	JLSBBG1S97K011694	376EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 20,000.00
COS203	2007	STERLING	FLATBED	DIESEL	JLSBBE1S77K002271	374EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 20,000.00
COS204	2007	STERLING	FLATBED	DIESEL	JLSBBG1S67K001964	375EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 20,000.00
COS218	2012	ISUZU	FLATBED	PROPANE	54DC4W1C3CS803578	369EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 35,000.00
COS219	2012	ISUZU	FLATBED	PROPANE	54DC4W1C1CS803577	368EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 35,000.00
COS220	2012	ISUZU	FLATBED	PROPANE	54DC4W1C9CS802533	370EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 35,000.00
COS221	2005	ISUZU	FLATBED	DIESEL	JALC4B16457009510	367EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 23,000.00
COS222	2007	STERLING	FLATBED	DIESEL	JLSBBG1S87K002226	366EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 25,000.00
COS224	2007	STERLING	FLATBED	DIESEL	JLSCCG1S27K011649	GMQ464	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 25,000.00
COS226	2007	STERLING	FLATBED	DIESEL	JLSBBG1SX7K002213	371EQN	CO	9/1/2017	PURCHASED	NONE	NONE	\$ 25,000.00
COS232	2006	HONDA	RIDGELIN	UNLEADED	2HJK1566H526784	464VGJ	CO	11/1/2016	PURCHASED	NONE	NONE	\$ 21,150.00

Ex A